

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Laurie Ortolano,

Plaintiff,

v.

The City of Nashua, New Hampshire, et al.,
Defendants.

No. 22-cv-00326-LM

RESPONSE TO ORDER TO SHOW CAUSE

Brian T. Corrigan, the undersigned *pro hac vice* counsel to defendants Inception Technologies, Inc. and Raymond Feoli, hereby responds to the Court's January 2, 2024 Order to Show Cause and, for the following reasons, respectfully requests that the Court withdraw said Order and confirm counsel's *pro hac vice* admission in this case.

On October 25, 2023, following the unanticipated withdrawal of my local co-counsel, Danilo J. Gomez, the Court ordered me to find successor local counsel to represent defendants Inception Technologies Inc. and Raymond Feoli in accordance with Local Rules 3.7 and 83.2(b). I then immediately began the search for local counsel to replace Attorney Gomez and to work with me on this case. The process was more difficult than expected. Without a network among the New Hampshire Bar, I had no direct contacts for prospective co-counsel.

On January 2, 2024, the Court ordered me to submit a filing showing cause as to why I should not be held in contempt for violation the Court's October 25, 2023 Order. By this time, I was in contact with Attorney Emmanuel Gonzalez, who is licensed to practice in both Massachusetts and New Hampshire. Attorney Gonzalez agreed to join the case and to file a Motion for Pro Hac Vice Admission on my behalf. On January 10, 2024, Attorney Gonzalez

filed his Appearance in this case. A new Motion for Pro Hac Vice Admission was e-filed earlier today.

My early efforts to resolve this matter and to bring my *pro hac vice* admission into compliance with the Rules, while made in good faith, were not effective. In hindsight, there are many things I should have done differently here. Among my regrets is the fact that I did not keep the Court informed as to my progress or lack thereof in order to obviate the need for the Court's January 2, 2024 Order. Thankfully, this matter is now resolved.

For the foregoing reasons, undersigned counsel respectfully requests that the Court withdraw the January 2, 2024 Order to Show Cause and allow Attorney Gonzalez's Motion to confirm my *pro hac vice* admission in this case.

Respectfully submitted,
Dated: January 16, 2024

/s/ Brian T. Corrigan
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CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

/s/ Brian T. Corrigan
Brian T. Corrigan